



State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-2900 FAX (603) 271-2456



May 13, 2003

**CERTIFIED MAIL**  
**7099 3400 0002 9774 1358**  
**RETURN RECEIPT REQUESTED**

**LETTER OF DEFICIENCY**  
**No. WMD 03-06**

Alltex Uniform Rental Services, Inc.  
P.O. Box 5246  
Manchester, New Hampshire 03103

Alan Cobb, President

**Alltex Uniform Rental Services, Inc.**  
**Manchester, New Hampshire**  
**EPA ID No. NHD001422351**

Dear Mr. Cobb

On January 23, 2003, the Department of Environmental Services, Waste Management Division (DES) conducted an inspection of Alltex Uniform Rental Services, Inc. (Alltex). The purpose of the inspection was to determine Alltex's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection and review of the information provided to DES, the following deficiencies were documented:

1 RSA 147-A:4/Env-Wm 353.04 – Limited Permit

At the time of inspection, Alltex was operating a Wastewater Treatment Unit (WWTU), at 341 Taylor Street (Wiper Laundering Facility) without a Limited Permit.

The Wiper Laundering WWTU generates a hazardous waste liquid (*i.e.* the liquid portion removed by the filter press), which meets the classification of a "sludge" as defined in Env-Wm 110.01(c)(114), and which is a hazardous waste as defined in Env-Wm 400. The hazardous waste sludge is regulated as a New Hampshire hazardous waste, with waste codes of D039, D008, and D007. The WWTU meets the definition of a hazardous waste treatment facility within RSA 147-A:2, IV because it generates and accumulates a wastewater treatment sludge that is a hazardous waste as defined in Env-Wm 400. DES has no record of receiving a Limited Permit application form from Alltex for the WWTU.

RSA 147-A:4, I requires any person who wishes to operate a hazardous waste treatment facility to first obtain a Limited Permit for a WWTU provided the operator meets the conditions specified in Env-Wm 353.04(b) through (o), including the submission of a Limited Permit application form.

At the time of inspection, Alltex was operating an elementary neutralization unit, located in the Clean Room Laundering Area. The Clean Room Laundering Area elementary neutralization unit is permitted by DES under Limited Permit No. DES-HW-LP-01-08. Alltex can modify the existing Limited Permit to include the Wiper Laundering WWTU by submitting a Limited Permit application form to DES. Permit modifications are subject to a \$250 fee, as referenced by Env-Wm 353.07(e)(7).

DES requests that Alltex modify the existing Limited Permit to include the Wiper Laundering WWTU. The modified permit can be obtained by submitting the enclosed New Hampshire Limited Permit application form.

2 Limited Permit # DES-HW-LP-01-08 – Inspections of Elementary Neutralization Unit

At the time of the inspection, Alltex was operating an elementary neutralization unit, located in the Clean Room Laundering Area, permitted by DES under Limited Permit #DES-HW-LP-01-08. No inspections of the elementary neutralization unit were conducted or documented.

Limited Permit # DES-HW-LP-01-08 requires that Alltex inspect its elementary neutralization unit for malfunctions, deterioration, operator errors, and discharges which may be causing, or may lead to, unauthorized release of hazardous waste to the environment or a threat to human health. Inspections must be recorded and documented in a log.

DES requested that Alltex develop and implement an inspection schedule for the Clean Room Laundering Area elementary neutralization unit. The inspections were to be designed in accordance with the requirements of Env-Wm 353.04(g) and recorded in a log.

*On February 4, 2003, Mr. Robert Hippert, Plant Engineer, submitted an inspection schedule and log to DES. No further action is required.*

3 Env-Wm 502.01 – Hazardous Waste Determination

At the time of inspection, Alltex had not performed an adequate hazardous waste determination for the waste filter cake generated by the Wiper Laundering WWTU.

Alltex generates a waste filter cake from the Wiper Laundering WWTU filter press. Multiple pressings of waste filter cake are accumulated in a roll-off container and sent for disposal every 8 to 10 weeks. The waste filter cake has been disposed of at the Waste Management Turnkey Landfill, in Rochester, New Hampshire, as a non-hazardous waste since September 2000.

As a condition of acceptance to the Turnkey Landfill, Waste Management requires annual sampling and analysis of the waste filter cake. Analysis of a sample collected on July 5, 2002, by Mr. Robert Hippert, revealed a flashpoint of 68 degrees Fahrenheit (*i.e.*, hazardous waste for the characteristic of ignitability) and a tetrachloroethylene concentration of 1 mg/L (*i.e.*, hazardous waste for the characteristic of toxicity). Although the filter cake waste was later re-sampled and

determined to be non-hazardous, since receiving the analytical results of the sample collected on July 5<sup>th</sup>, Waste Management has required Alltex to sample and analyze every roll-off container of waste filter cake sent for disposal. Analysis of a sample collected on November 5, 2002, also revealed a tetrachloroethylene concentration of 1 mg/L. At the time of the inspection, the roll-off container storing the waste filter cake that was sampled on November 5th was stored on site as a hazardous waste container, marked with a waste code of D039 (*i.e.*, tetrachloroethylene).

Alltex's current sampling procedure is to collect a composite sample from a full roll-off container of waste filter cake. Due to the highly variable process that generates the waste filter cake, and the time lapsed between the initial generation and final deposition of the waste, the current sampling procedure may not ensure the collection of a representative sample of the waste filter cake.

Env-Wm 502.01 requires a generator of a waste to determine if their waste is a hazardous waste. Waste determined to be hazardous must be handled pursuant to the requirements of the Hazardous Waste Rules.

DES requests that Alltex develop a written sampling procedure that ensures the collection of a representative sample of the waste filter cake. Due to the potentially volatile nature of the wastes the waste filter cake should be sampled at the point and time of generation. DES considers the point and time of generation to be immediately after the filter cake is removed from the filter press, prior to accumulation in the roll-off container. Please note that a representative sample is defined in Env-Wm 110.01(b)(107) as, "a sample of a universe or whole that can be expected to exhibit the average properties of the universe or the whole." The sampling procedure should ensure that waste filter cake that is a hazardous waste is never incorrectly characterized as non-hazardous waste. Alltex will need to provide a copy of the sampling procedure to DES.

#### 4 Env-Wm 509.02(a)(2) Personnel Training

A review of Alltex's personnel training program documents revealed that the Primary Emergency Coordinator, Robert Hippert, had not taken part in an annual training review for the following years: 1998, 2000, and 2002.

Env-Wm 509.02(a)(2), which references 40 CFR 265.16, Personnel Training, requires full quantity generators to maintain a personnel training program. This includes but is not limited to, ensuring that personnel responsible for hazardous waste management are initially trained and participate in annual reviews.

DES requests that Alltex conduct and document hazardous waste training and annual updates for the Primary and Secondary Emergency Coordinators as well as all employees who handle hazardous waste. Please submit the updated training documentation to DES.

5 Env-Wm 509.02(a)(5) – Contingency Plan

A review of Alltex's contingency plan revealed deficiencies regarding the following:

- a. The plan had not been immediately amended to reflect a change in the alternate emergency coordinator.
- b. The plan had not been amended to include the acquisition of the building at 341 Taylor Street.
- c. An amended plan had not been submitted to local authorities.

Env-Wm 509.02(a)(5), which references 40 CFR 265, Subpart D, requires full quantity generators to maintain a complete contingency plan at the site.

DES requested that Alltex amend the facility contingency plan to correct any deficiencies as identified in the enclosed Contingency Plan Module and submit the amended plan to the local authorities.

*On February 4, 2003, Mr. Robert Hippert submitted to DES, revised portions of the Contingency Plan and documentation that the amended plan had been distributed to local authorities. No further action is required.*

6. Env-Wm 509.02(c) – Outdoor Hazardous Waste Storage Area Requirements

At the time of inspection, one (1) roll-off container of hazardous waste filter cake was stored in the outdoor hazardous waste storage area located behind 341 Taylor Street. The outdoor hazardous waste storage area was not completely enclosed by a natural or artificial barrier, did not have a means to control entry and did not have a sign posted with the words: "Danger – Unauthorized Personnel Keep Out".

Env-Wm 509.02(c) requires full quantity generators to provide the following security measures at all outdoor storage areas:

- 1 An artificial or natural barrier, such as a fence in good repair, which completely surrounds the hazardous waste storage area to prevent the unauthorized or unknowing entry of persons or livestock;  
  
A means to control entry, at all times, through gates or other entrances to the hazardous waste storage area such as an attendant, television monitor, locked entrance or controlled roadway access to the area; and
- 3 A sign with the legend, "Danger - Unauthorized Personnel Keep Out", at each entrance to the hazardous waste storage area. Existing signs with other than the aforementioned

legend may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the area and that entry can be dangerous.

DES requests that Alltex provide the security measures required by Env-Wm 509.02(c) at the outdoor hazardous waste storage area.

7 Env-Wm 807.06(b)(7) – Standards for Generators of Used Oil

At the time of the inspection, Alltex had not completed a used oil determination for its generated “Used Oil for Recycle.”

Env-Wm 807.06(b)(7) requires generators to conduct an initial used oil determination by analyzing it for all of the parameters specified in Env-Wm 807.02 and Env-Wm 807.03 (exclusive of PCB's if no source of PCB's is present).

DES requests that Alltex conduct an initial used oil determination for the parameters outlined in Env-Wm 807.02 and Env-Wm 807.03. These parameters include arsenic, cadmium, chromium, lead, flash point, and total halogens. Alltex should provide the results of the used oil determination to DES. Enclosed please find a summary of the used oil regulations and a list of analytical laboratories that perform the required testing.

8 Env-Wm 1103.03 – General Requirements for Small Quantity Universal Waste Handlers

At the time of the inspection, Alltex had not informed all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type of universal waste (lamps) handled at the facility.

Env-Wm 1103.03 requires that a small quantity handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.

DES requested that Alltex develop a training program to inform all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. DES further requested that a copy of the training program be submitted to DES.

*On February 4, 2003, Mr. Robert Hippert submitted a universal waste training program to DES. No further action is required.*

9 Env-Wm 1112.03(a) – Requirements for Universal Waste Lamps

At the time of the inspection, two (2) 8-foot universal waste lamps, located in the Garment Laundering Area, were not stored in containers.

Env-Wm 1112.03(a) requires universal waste handlers to store intact and broken lamps in container(s) that meet the requirements of Env-Wm 1102.03(c). Env-Wm 1102.03(c) furthermore stipulates the containers must be closed, compatible with the universal waste and its contents, and free of defects, design characteristics, or damage that could result in leakage, spillage or other environmental releases.

DES requested that Alltex store universal waste lamps in containers that meet the requirements of Env-Wm 1102.03(c).

*In the February 4, 2003 submittal, Mr. Robert Hippert stated that the universal waste lamps were placed in a labeled container on January 23, 2003. No further action is required.*

10. Env-Wm 1112.04 – Requirements for Universal Waste Lamps

At the time of the inspection, the two (2) universal waste lamps were not marked with the words "Universal Waste – Lamps", "Waste Lamp(s)", or "Used Lamp(s)."

Env-Wm 1112.04 requires universal waste handlers to clearly label or mark each lamp or container(s) holding universal waste lamps with any of the following: "Universal Waste – Lamps", "Waste Lamp(s)", or "Used Lamp(s)."

DES requested that Alltex clearly label or mark each lamp or container(s) holding universal waste lamps with any of the following: "Universal Waste – Lamps", "Waste Lamp(s)", or "Used Lamp(s)."

*In the February 4, 2003 submittal, Mr. Robert Hippert stated that the universal waste lamps were placed in a labeled container on January 23, 2003. No further action is required.*

DES believes the cited deficiencies can be corrected and a report describing the corrective measures taken by Alltex can be submitted within thirty (30) days of receipt of this letter. Supporting documentation that describes the measures taken to achieve compliance should be included with the report.

In the event compliance is not achieved within this period, DES may take further action against Alltex, including issuing an order requiring that deficiencies be corrected, initiating an administrative fine proceeding, and/or referring the matter to the New Hampshire Department of Justice for imposition of civil penalties. In addition, DES personnel may re-inspect your facility at a later date to determine whether the facility has come into, and is maintaining, full compliance with the applicable rules. Fines may also be pursued for any or all violations observed during this or subsequent inspections of the facility.

DES

The written report as requested above should be addressed as follows:

Kenneth W. Marschner, Administrator  
DES/WMD  
6 Hazen Drive  
Concord, New Hampshire 03301-6509

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This report may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff is available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM at 271-2942.

Should you have any questions regarding this letter, please contact the lead inspector, Robert Bishop or John J. Duclos, Supervisor of the Hazardous Waste Compliance Section, at 271-2942. Thank you for your cooperation.

Sincerely,

COPY

Kenneth W. Marschner, Administrator  
Waste Management Programs  
Waste Management Division

cc: DB/RCRA/LOD/Archives  
Philip J. O'Brien, Ph.D., P.G., Director, WMD  
Gretchen Rule, Esq., Administrator, DES Legal Unit  
Robert Hippert, EH&S Coordinator, Alltex

E-mail: JJD/SD/SD/PM

Enclosure: Hazardous Waste Generator Inspection Report  
Limited Permit Application Form  
Summary of the Used Oil Regulations  
List of Analytical Testing Laboratories